

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 4-2732-00014/00057  
Effective Date: 11/09/2021 Expiration Date: 11/08/2026

Permit Issued To: KEYMARK CORPORATION  
1188 CAYADUTTA ST  
FONDA, NY 12068

Contact: FRED K LASHER  
KEYMARK CORPORATION  
1188 CAYADUTTA ST  
FONDA, NY 12068  
(518) 853-3421

Facility: KEYMARK CORP PLANT  
1188 CAYADUTTA ST  
FONDA, NY 12068

Contact: FRED K LASHER  
KEYMARK CORPORATION  
1188 CAYADUTTA ST  
FONDA, NY 12068  
(518) 853-3421

Description:

**This application consists of the renewal of the facility's Title V permit. The application also includes the removal of Paint Line 2 from the facility (Emission Units U-00034, U-30001, and U-30002). Three changes that were made via the facility's operational flexibility protocol are also included. They are: the replacement of the die cleaning system (U-00027), the addition of a static stack for emission units U-00016 and U-00017, and the installation of a sow preheater (emission unit U-00005). The facility's potential to emit calculations have been updated to reflect these changes.**

**Facility DEC ID: 4273200014**

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:           KATE KORNAK  
  NYSDEC - REGION 4  
  1130 N WESTCOTT RD  
  SCHENECTADY, NY 12306-2014

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

**Notification of Other State Permittee Obligations**

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

**PAGE LOCATION OF CONDITIONS**

**PAGE**

**DEC GENERAL CONDITIONS**

**General Provisions**

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS

**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1130 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069

**Permit ID: 4-2732-00014/00057**

**Facility DEC ID: 4273200014**

**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:KEYMARK CORPORATION  
1188 CAYADUTTA ST  
FONDA, NY 12068

Facility: KEYMARK CORP PLANT  
1188 CAYADUTTA ST  
FONDA, NY 12068

Authorized Activity By Standard Industrial Classification Code:  
3354 - ALUMINUM EXTRUDED PRODUCTS

Permit Effective Date: 11/09/2021

Permit Expiration Date: 11/08/2026

**PAGE LOCATION OF CONDITIONS****PAGE****FEDERALLY ENFORCEABLE CONDITIONS****Facility Level**

8	1	6 NYCRR 200.6: Acceptable Ambient Air Quality
8	2	6 NYCRR 201-6.4 (a) (7): Fees
9	3	6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
9	4	6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
9	5	6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
12	6	6 NYCRR 201-6.4 (e): Compliance Certification
13	7	6 NYCRR 202-2.1: Compliance Certification
14	8	6 NYCRR 202-2.5: Recordkeeping requirements
14	9	6 NYCRR 215.2: Open Fires - Prohibitions
15	10	6 NYCRR 200.7: Maintenance of Equipment
15	11	6 NYCRR 201-1.7: Recycling and Salvage
16	12	6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
16	13	6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
16	14	6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
16	15	6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
17	16	6 NYCRR 201-6.4 (a) (8): Right to Inspect
17	17	6 NYCRR 202-1.1: Required Emissions Tests
17	18	40 CFR Part 68: Accidental release provisions.
18	19	40CFR 82, Subpart F: Recycling and Emissions Reduction
18	20	6 NYCRR Subpart 201-6: Emission Unit Definition
21	21	6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
21	22	6 NYCRR 201-6.4 (f): Operational Flexibility
22	23	6 NYCRR 201-6.4 (f) (2): Compliance Certification
24	24	6 NYCRR 211.2: Visible Emissions Limited
24	25	6 NYCRR 212-1.6 (a): Compliance Certification
26	26	6 NYCRR 212-2.4 (b): Compliance Certification
27	27	40CFR 63, Subpart A: General Provisions
		<b>Emission Unit Level</b>
27	28	6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
30	29	6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=U-00005**

40	30	40CFR 63.3967(f), Subpart Mmmm: Compliance Certification
----	----	--

**EU=U-00035**

41	31	6 NYCRR 212-2.4 (b): Compliance Certification
42	32	6 NYCRR 228-1.3 (a): Compliance Certification
43	33	6 NYCRR 228-1.3 (b) (1): Compliance Certification
44	34	6 NYCRR 228-1.3 (d): Compliance Certification
46	35	6 NYCRR 228-1.3 (e): Surface Coating- application requirements
46	36	6 NYCRR 228-1.4 (b) (4): Compliance Certification
48	37	6 NYCRR 228-1.5 (b): Natural gas fired VOC incineration control device efficiency and seasonal shut down.
48	38	6 NYCRR 228-1.6 (a): Compliance Certification
49	39	6 NYCRR 228-1.6 (d): Overall Removal Efficiency
49	40	6 NYCRR 228-1.6 (e): VOC content of gas stream test methods



50 41 6 NYCRR 228-1.6 (h): Compliance Certification  
50 42 40CFR 63.3890(c)(2), Subpart M MMM: Determining  
Alternative Facility Specific Emission Limits  
51 43 40CFR 63.3891(c), Subpart M MMM: Compliance Certification  
52 44 40CFR 63.3892(b), Subpart M MMM: Compliance Certification  
53 45 40CFR 63.3893(b), Subpart M MMM: Compliance Certification  
54 46 40CFR 63.3900(a)(2)(i), Subpart M MMM: Periods when  
emission limit must be met  
54 47 40CFR 63.3900(a)(2)(ii), Subpart M MMM: Times when  
the facility must be in compliance with operating limits  
55 48 40CFR 63.3900(b), Subpart M MMM: Operation of  
affected source(s) during periods of startup, shutdown, or malfunction  
55 49 40CFR 63.3920(a), Subpart M MMM: Compliance Certification  
57 50 40CFR 63.3920(b), Subpart M MMM: Performance Test Reports  
57 51 40CFR 63.3930, Subpart M MMM: Compliance Certification  
61 52 40CFR 63.3931, Subpart M MMM: Length of time to keep records  
61 53 40CFR 63.3963(a), Subpart M MMM: Compliance Certification  
62 54 40CFR 63.3963(b), Subpart M MMM: Compliance Certification  
63 55 40CFR 63.3963(c), Subpart M MMM: Compliance Certification  
63 56 40CFR 63.3963(d), Subpart M MMM: Compliance Certification  
64 57 40CFR 63.3963(e), Subpart M MMM: Compliance Certification  
65 58 40CFR 63.3963(f), Subpart M MMM: Compliance Certification  
65 59 40CFR 63.3964(b), Subpart M MMM: Compliance Certification  
66 60 40CFR 63.3967(a), Subpart M MMM: Compliance Certification  
67 61 40CFR 63.3968(a), Subpart M MMM: Compliance Certification  
69 62 40CFR 63.3968(b), Subpart M MMM: Compliance Certification  
70 63 40CFR 63.3968(c), Subpart M MMM: Compliance Certification  
70 64 40CFR 63.3968(c), Subpart M MMM: Compliance Certification  
71 65 40CFR 63.3968(c), Subpart M MMM: Compliance Certification  
72 66 40CFR 63.3968(g), Subpart M MMM: Compliance Certification  
72 67 40CFR 63.3968(g), Subpart M MMM: Compliance Certification  
73 68 40CFR 63.3968(g), Subpart M MMM: Compliance Certification  
74 69 40CFR 63.3968(g), Subpart M MMM: Compliance Certification

**EU=U-00035,Proc=E01,ES=E001A**

74 70 40CFR 63.3892(b), Subpart M MMM: Compliance Certification

**EU=U-00035,Proc=E13,ES=E0013**

75 71 40CFR 63.3892(b), Subpart M MMM: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS****Facility Level**

78 72 ECL 19-0301: Contaminant List  
78 73 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities  
79 74 6 NYCRR 201-6.5 (a): CLCPA Applicability  
79 75 6 NYCRR 212-2.3 (b): Compliance Demonstration  
81 76 6 NYCRR 212-2.3 (b): Compliance Demonstration  
82 77 6 NYCRR 212-2.3 (b): Compliance Demonstration

**FEDERALLY ENFORCEABLE CONDITIONS**  
Renewal 4/FINAL \*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**  
**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

- Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)**  
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)**  
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**  
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**  
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)**  
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay

any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item H: Severability - 6 NYCRR 201-6.4 (a) (9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item I: Permit Shield - 6 NYCRR 201-6.4 (g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item K: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable

rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 1.1:**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

**Item 2.1:**

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c)**

**Item 3.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)**

**Item 4.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 5: Compliance Certification  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

## Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

## Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in

paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
  - and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the

Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch  
USEPA Region 2 DECA/ACB  
290 Broadway, 21st Floor  
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 4 Headquarters  
1130 North Westcott Road  
Schenectady, NY 12306-2014

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 6 NYCRR 202-2.1**

**Item 7.1:**  
The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar

year. Statements are to be mailed to: New York State  
Department of Environmental Conservation, Division of Air  
Resources, Bureau of Air Quality Planning, 625 Broadway,  
Albany NY 12233-3251

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 202-2.5**

**Item 8.1:**

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
  - (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item 9.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left

unattended until extinguished.

(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.

(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 10: Maintenance of Equipment  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

**Condition 11: Recycling and Salvage  
Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Condition 13: Exempt Sources - Proof of Eligibility**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Item 13.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 14: Trivial Sources - Proof of Eligibility**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)**

**Item 15.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: Right to Inspect**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 17: Required Emissions Tests**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 17.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 18: Accidental release provisions.**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 18.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided

in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
C/O CSC  
8400 Corporate Dr  
Carrollton, Md. 20785

**Condition 19: Recycling and Emissions Reduction**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 19.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 20: Emission Unit Definition**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 20.1:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00005

Emission Unit Description:

This emission unit consists of the cast house melter for aluminum scrap, ingots, sows, etc. The furnace is heated with a natural gas burner. Emissions from melting and combustion are ducted through three stacks including the melter (EP 00005), fume hood (EP 00008), and the old sow heater stack (EP 00007). The fume hood is located over the entrance to the melter. The new sow preheater has a separate stack (EP 0007B). These operations are located in the cast house area of the main plant.

Building(s): 1

**Item 20.2:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00006

Emission Unit Description:

This emission unit consists of the cast house holder for molten aluminum received from the cast house melter. The holder maintains molten aluminum at temperature prior to

tapping and pouring into molds. The furnace is heated with a natural gas burner. Emissions from the molten aluminum and natural gas combustion are ducted through a single stack. Small quantities of magnesium and silicon may be added to the holder to meet certain alloy specifications.

Building(s): 1

**Item 20.3:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00016

Emission Unit Description:

This emission unit consists of the alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an alkaline solution as they pass through on a conveyor.

Building(s): 5

**Item 20.4:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00017

Emission Unit Description:

This emission unit consists of the acid pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an acid solution as they pass through on a conveyor.

Building(s): 5

**Item 20.5:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00027

Emission Unit Description:

This emission unit consists of heated alkaline solution tanks in which aluminum is removed from extrusion dies in the die shop. The tanks are heated with natural gas fired burners. The combustion emissions are exhausted with the process emissions.

Building(s): 1

**Item 20.6:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00028

Emission Unit Description:

This emission unit consists of the hook oven. Dried paint on conveyor hooks is removed in a controlled pyrolysis cleaning furnace. The furnace is heated with a natural gas fired burner. The combustion emissions are exhausted with the process emissions.

Building(s): 1



**Item 20.7:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00029

Emission Unit Description:

This emission unit consists of the fill and debridge area. Channels in extruded aluminum parts are filled with resin. A strip of aluminum is then removed in order to form a thermal barrier.

Building(s): 2

**Item 20.8:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00035

Emission Unit Description:

This emission unit consists of Paint Line 1. Paint Line 1 is a conveyORIZED paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations: pretreatment acid and alkaline showers (Emission Units U-00016 and U-00017), drying oven, coating application in four spray booths using electrostatic disks, bake oven, and flash off. Paint is mixed and distributed from a separate room. Solvent is used to clean up the spraying equipment. Filters are used in all booths for particulate control. The exhausts of the booths, bake oven, smoke hood, and flash off area are vented through two thermal oxidizers which also have filters.

Building(s): 1

**Item 20.9:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00036

Emission Unit Description:

This emission unit consists of four aging ovens and one homogenizing furnace. The aging ovens are natural gas fired Granco Clark units each with a maximum burner rating of 2 MMBtu/hr. The homogenizing furnace is a natural gas fired Remelt Technologies unit with a maximum burner rating of 18 MMBtu/hr. The furnace is housed in a separate building located to the north of the main plant. The only emissions associated with the ovens and furnaces are generated from the combustion of the natural gas.

Building(s): 1  
3

**Item 20.10:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-10001

Emission Unit Description:

This emission unit consists of the 15,000 gallon heated anodize line solution tank 2.

Building(s): 2

**Item 20.11:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-10007

Emission Unit Description:

This emission unit consists of the 8,000 gallon heated anodize line alkaline solution tanks 5 and 7.

Building(s): 2

**Item 20.12:**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-10008

Emission Unit Description:

This emission unit consists of the 8,000 gallon anodize line acid solution tanks 12A and 12B.

Building(s): 2

**Condition 21: Progress Reports Due Semiannually**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)**

**Item 21.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 22: Operational Flexibility**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f)**

**Item 22.1:**

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

**Condition 23: Compliance Certification**

Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (f) (2)**

**Item 23.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 23.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V permit the capability to make certain changes using the following protocol. As provided under 6 NYCRR Part 201-6.4(f)(2), changes made pursuant to an approved protocol are not subject to the Title V permit modification provisions in 6 NYCRR Part 201-6.6.

II. Protocol

A. Criteria

1. Changes reviewed pursuant to this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a project that results in an emissions increase that exceeds the applicable significant project threshold identified in 6 NYCRR Part 231.

c. The facility shall not use this protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable cap either to avoid major NSR requirements or to address and comply with other Clean Air Act requirements, such as RACT. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under

the Protocol

1. The facility shall notify the Department in writing at least seven days in advance of the proposed change.
2. Notifications made in accordance with this protocol must include the following documentation:
  - a. Identification of the Title V permit emission unit, process(es), emission sources and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;
  - b. Description of the proposed change, including proposed operating parameters;
  - c. Identification and description of emissions control technology;
  - d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following:
    - i. Calculations demonstrating the emission rate potential and maximum projected actual annual emission rates for all contaminants affected by the change.
    - ii. Documentation of major NSR program non-applicability for NYSDEC review and approval.
    - iii. Identification and evaluation of the applicability of all regulations likely to be triggered by the new or changed emission source.
    - iv. A proposal describing any operating and/or record keeping procedures necessary to ensure compliance.
  - e. Any other relevant information used for the evaluation of the proposed project or emission source pursuant to this protocol.

#### C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification of the permittee.
2. The Department may require a permit modification in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).

3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

**D. Additional Compliance Obligations for Changes Made Under this Protocol**

1. Upon commencement of operation of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.

2. The facility shall provide a summary of the changes made in accordance with this protocol and a statement of the compliance status of each with each semiannual monitoring report. Reported changes must include all changes made during the corresponding semiannual period and any earlier changes that have not yet been incorporated into the permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 24: Visible Emissions Limited**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 24.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 25: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 25.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00005

Emission Unit: U-00006

Emission Unit: U-00016

Emission Unit: U-00017

Emission Unit: U-00027

Emission Unit: U-00028

Emission Unit: U-00029

Emission Unit: U-00036

Emission Unit: U-10001

Emission Unit: U-10007

Emission Unit: U-10008

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The facility owner/operator shall conduct a visible emissions observation (determining the presence or absence of visible emissions greater than the limit specified) of all emission points and/or emission sources once per day, during daylight hours, except during conditions of extreme weather (fog, snow, rain). If any visible emissions are noted above the limit specified, corrective action is required.

If any visible emissions greater than the limit specified (except the emission of uncombined water) are observed for two consecutive operating days from the same emission point and/or emission source, the facility owner/operator will notify the Department of the observations within one business day. The facility owner/operator will also perform a Method 9 analysis of the affected emission point and submit the results to the Department.

Daily records of the visible emissions observations are to be maintained, including the date, time of observation,

weather conditions, results of the visible emissions observations, corrective actions taken, and explanations for days when weather conditions are prohibitive, on-site for a period of five years.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Test Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 26: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 26.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00005

Emission Unit: U-00006

Emission Unit: U-00028

Emission Unit: U-00035

Emission Unit: U-00036

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains per dry standard cubic foot of exhaust gas. The facility owner or operator shall conduct compliance testing in order to demonstrate compliance with this requirement upon request by the Department.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Test Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

## DESCRIPTION

Averaging Method: Arithmetic average of stack test runs  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2022.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 27: General Provisions**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63, Subpart A**

**Item 27.1:**

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

## \*\*\*\* Emission Unit Level \*\*\*\*

**Condition 28: Emission Point Definition By Emission Unit**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 28.1:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00005

Emission Point: 00005

Height (ft.): 37	Length (in.): 42	Width (in.): 42
NYTMN (km.): 4756.235	NYTME (km.): 549.729	Building: 1

Emission Point: 00007

Height (ft.): 31	Diameter (in.): 28	
NYTMN (km.): 4756.245	NYTME (km.): 549.734	Building: 1

Emission Point: 00008

Height (ft.): 35	Diameter (in.): 36	
NYTMN (km.): 4756.24	NYTME (km.): 549.725	Building: 1

Emission Point: 0007B

Height (ft.): 30	Length (in.): 20	Width (in.): 13
NYTMN (km.): 4756.244	NYTME (km.): 549.734	Building: 1

**Item 28.2:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00006

Emission Point: 00006

Height (ft.): 38	Length (in.): 42	Width (in.): 42
------------------	------------------	-----------------



NYTMN (km.): 4756.232 NYTME (km.): 549.727 Building: 1

**Item 28.3:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00016

Emission Point: 00016

Height (ft.): 45 Diameter (in.): 24  
NYTMN (km.): 4756.218 NYTME (km.): 549.852 Building: 5

Emission Point: 00046

Height (ft.): 48 Diameter (in.): 18  
NYTMN (km.): 4756.167 NYTME (km.): 549.857 Building: 5

**Item 28.4:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00017

Emission Point: 00017

Height (ft.): 45 Diameter (in.): 24  
NYTMN (km.): 4756.22 NYTME (km.): 549.85 Building: 5

**Item 28.5:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00027

Emission Point: 00027

Height (ft.): 35 Diameter (in.): 15  
NYTMN (km.): 4756.241 NYTME (km.): 549.759 Building: 1

**Item 28.6:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00028

Emission Point: 00028

Height (ft.): 38 Diameter (in.): 14  
NYTMN (km.): 4756.105 NYTME (km.): 549.925 Building: 1

**Item 28.7:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00029

Emission Point: 00029

Height (ft.): 12 Diameter (in.): 9  
NYTMN (km.): 4756.149 NYTME (km.): 549.947 Building: 2

**Item 28.8:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00035

Emission Point: 00018  
 Height (ft.): 42 Diameter (in.): 32  
 NYTMN (km.): 4756.211 NYTME (km.): 549.834 Building: 1

Emission Point: 00019  
 Height (ft.): 42 Diameter (in.): 32  
 NYTMN (km.): 4756.211 NYTME (km.): 549.818 Building: 1

Emission Point: 00020  
 Height (ft.): 42 Diameter (in.): 32  
 NYTMN (km.): 4756.207 NYTME (km.): 549.824 Building: 1

Emission Point: 00021  
 Height (ft.): 42 Diameter (in.): 32  
 NYTMN (km.): 4756.203 NYTME (km.): 549.833 Building: 1

Emission Point: 00022  
 Height (ft.): 42 Diameter (in.): 32  
 NYTMN (km.): 4756.2 NYTME (km.): 549.84 Building: 1

Emission Point: 00023  
 Height (ft.): 16 Diameter (in.): 12  
 NYTMN (km.): 4756.223 NYTME (km.): 549.833 Building: 1

Emission Point: 00030  
 Height (ft.): 40 Diameter (in.): 48  
 NYTMN (km.): 4756.226 NYTME (km.): 549.841 Building: 1

Emission Point: 00045  
 Height (ft.): 40 Diameter (in.): 44  
 NYTMN (km.): 4756.229 NYTME (km.): 549.834

**Item 28.9:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00036

Emission Point: 00036  
 Height (ft.): 23 Diameter (in.): 20  
 NYTMN (km.): 4756.179 NYTME (km.): 549.804 Building: 1

Emission Point: 00037  
 Height (ft.): 23 Diameter (in.): 20  
 NYTMN (km.): 4756.148 NYTME (km.): 549.82 Building: 1

Emission Point: 00038  
 Height (ft.): 23 Diameter (in.): 18  
 NYTMN (km.): 4756.144 NYTME (km.): 549.817 Building: 1

Emission Point: 00039  
 Height (ft.): 23 Diameter (in.): 14  
 NYTMN (km.): 4756.185 NYTME (km.): 549.807 Building: 1

Emission Point: 00043  
 Height (ft.): 36 Length (in.): 36 Width (in.): 36  
 NYTMN (km.): 4756.249 NYTME (km.): 549.666 Building: 3

Emission Point: 00044  
 Height (ft.): 36 Length (in.): 36 Width (in.): 36  
 NYTMN (km.): 4756.245 NYTME (km.): 549.671 Building: 3

**Item 28.10:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-10001

Emission Point: 10001  
 Height (ft.): 39 Diameter (in.): 48  
 NYTMN (km.): 4756.104 NYTME (km.): 549.973 Building: 2

**Item 28.11:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-10007

Emission Point: 10007  
 Height (ft.): 53 Length (in.): 72 Width (in.): 48  
 NYTMN (km.): 4756.098 NYTME (km.): 549.983 Building: 2

**Item 28.12:**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-10008

Emission Point: 1008A  
 Height (ft.): 53 Length (in.): 72 Width (in.): 48  
 NYTMN (km.): 4756.089 NYTME (km.): 550.003 Building: 2

**Condition 29: Process Definition By Emission Unit**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6****Item 29.1:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00005  
 Process: 004 Source Classification Code: 3-04-001-14  
 Process Description:

This process involves the charging of the cast house melter with aluminum. A typical charge to the melter is 55,000 pounds of aluminum. Flux is typically added to each charge but the quantity of flux added is less than 0.5 percent of the total charge. Alloying elements, such as copper and manganese, may also be added. The melter emissions are exhausted through the melter stack (EP 00005), fume hood (EP 00008), and the old sow heater stack

(EP 00007).

Emission Source/Control: 00009 - Process

**Item 29.2:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00005

Process: E02

Source Classification Code: 1-02-006-02

Process Description:

This process consists of the natural gas fired burner for the melter. The melter combustion emissions are exhausted through the melter stack (EP 00005), fume hood (EP 00008), and the old sow preheater stack (EP 00007).

Emission Source/Control: E0002 - Combustion

Design Capacity: 19 million Btu per hour

**Item 29.3:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00005

Process: E16

Source Classification Code: 1-02-006-03

Process Description:

This process consists of the natural gas fired sow preheater burner.

Emission Source/Control: E0016 - Combustion

Design Capacity: 4.9 million Btu per hour

**Item 29.4:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00006

Process: 005

Source Classification Code: 3-04-001-14

Process Description:

This process consists of the holding, tapping, and pouring of molten aluminum received from the cast house melter. A typical charge to the holder is 55,000 pounds of aluminum. Magnesium ingots and silicon disks are typically added, but the quantity is less than 0.5 percent of the charge. Other alloying elements, such as copper, may also be added.

Emission Source/Control: 0000B - Process

**Item 29.5:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00006

Process: E03

Source Classification Code: 1-02-006-02

Process Description:

This process consists of the natural gas fired burner for the holder. The combustion emissions are exhausted through the stack of the holder.

Emission Source/Control: E0003 - Combustion  
Design Capacity: 18 million Btu per hour

**Item 29.6:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00016  
Process: 012 Source Classification Code: 3-99-999-94

**Process Description:**

Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the inlet to the shower system. The alkaline solution is drawn from a 2,900 gallon tank maintained at 150 F. The spray nozzle flow is 2.8 gallons per minute.

Emission Source/Control: 00016 - Process

**Item 29.7:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00017  
Process: 013 Source Classification Code: 3-99-999-94

**Process Description:**

Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the outlet to the shower system. The acid solution is drawn from a 2,000 gallon tank maintained at 120 F. The spray nozzle flow is 2.8 gallons per minute.

Emission Source/Control: 00017 - Process

**Item 29.8:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00027  
Process: 01C Source Classification Code: 3-99-999-94

**Process Description:**

This process consists of the fully automated die cleaning system. Dies are loaded into several baskets in the loading area. The baskets are conveyed inside the cleaning system where they are immersed in order to remove residual aluminum and then conveyed to the unloading area. Solutions of caustic soda and water are heated using a 0.67 MMBtu/hr natural gas burner. The system includes a fume vacuum and washing system. The tanks have process ventilation. Emissions are in the form of liquid particulate.

Emission Source/Control: 00052 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00022 - Process

**Item 29.9:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00027

Process: F04

Source Classification Code: 1-02-006-03

Process Description:

This process consists of one natural gas fired burner for the solution tanks. The combustion emissions are exhausted through the solution tanks stack.

Emission Source/Control: E0004 - Combustion

Design Capacity: 0.5 million Btu per hour

**Item 29.10:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00028

Process: 01D

Source Classification Code: 3-99-999-94

Process Description:

This process consists of the controlled pyrolysis heating furnace used to remove dried paint from batches of hooks. The hooks are used to suspend extruded aluminum parts painted in the paint spray line conveyor system. The furnace is heated with a natural gas fired burner. The majority of the paint is converted to ash and removed as waste.

Emission Source/Control: 00023 - Process

**Item 29.11:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00028

Process: F05

Source Classification Code: 1-02-006-03

Process Description:

This process consists of the natural gas fired burner for the pyrolysis furnace. The combustion emissions are exhausted through the stack of the furnace.

Emission Source/Control: E0005 - Combustion

Design Capacity: 0.46 million Btu per hour

**Item 29.12:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00029

Process: 01E

Source Classification Code: 3-99-999-94

Process Description:

In order to form a thermal break in certain products (e.g. window frames) a two part resin is injected into a channel in the extruded part. A strip of aluminum is then machined away leaving a gap between the two parts of the aluminum extrusion. The two parts of the resin react with negligible emissions. The resin lines are flushed out

using a solvent. There are minimal solvent emissions.

Emission Source/Control: 00024 - Process

**Item 29.13:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 006

Source Classification Code: 4-02-008-10

Process Description:

This process consists of the Paint Line 1 bake oven. Painted parts are conveyed through a bake oven. The oven is heated using a natural gas fired burner. Combustion emissions from the burner and the oven exhaust are vented through thermal oxidizers.

Emission Source/Control: 00025 - Process

**Item 29.14:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 008

Source Classification Code: 4-02-025-01

Process Description:

This process consists of Paint Line 1 paint spray booth  
1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Emission Source/Control: 10028 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 10027 - Process

**Item 29.15:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 009

Source Classification Code: 4-02-025-01

Process Description:

This process consists of Paint Line 1 spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Emission Source/Control: 1002B - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 1002A - Process

**Item 29.16:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035  
Process: 00A Source Classification Code: 4-02-025-01

Process Description:  
This process consists of Paint Line 1 spray booth 3. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Emission Source/Control: 1002E - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 1002D - Process

**Item 29.17:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035  
Process: 00B Source Classification Code: 4-02-025-01

Process Description:  
This process consists of Paint Line 1 spray booth 4. Paint applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Emission Source/Control: 10031 - Control  
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 10030 - Process

**Item 29.18:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035  
Process: 014 Source Classification Code: 4-02-025-99

Process Description:  
This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven.

Emission Source/Control: 00018 - Process

**Item 29.19:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035  
Process: 015 Source Classification Code: 4-02-025-99

Process Description:  
This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily



designed to remove heat from the area over the bake oven.

Emission Source/Control: 00019 - Process

**Item 29.20:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 016

Source Classification Code: 4-02-025-99

Process Description:

This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven.

Emission Source/Control: 0001A - Process

**Item 29.21:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 017

Source Classification Code: 4-02-025-99

Process Description:

This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven.

Emission Source/Control: 0001B - Process

**Item 29.22:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 020

Source Classification Code: 4-02-025-99

Process Description:

This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven.

Emission Source/Control: 00042 - Process

**Item 29.23:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 022

Source Classification Code: 4-02-025-99

Process Description:

This process consists of the smoke hood over the inlet/outlet to the bake oven for Paint Line 1. The purpose of the smoke hood is to vent heated air from the oven. The exhaust is vented through thermal oxidizers.

Emission Source/Control: 00036 - Process

**Item 29.24:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: 024

Source Classification Code: 4-02-025-99

Process Description:

This process consists of the Paint Line 1 flash off tunnel. Following the application of coatings in the paint spray booths, the parts are conveyed through a flash off area. A vent over the area exhausts any emissions that occur during flash off through thermal oxidizers.

Emission Source/Control: 00040 - Process

**Item 29.25:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: E01

Source Classification Code: 1-02-006-03

Process Description:

This process consists of the natural gas fired burner for the Model 30 oxidizer (Oxidizer #1) with a maximum rated capacity of 2.81 MMBtu/hr.

Emission Source/Control: E001A - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00025 - Process

Emission Source/Control: 00036 - Process

Emission Source/Control: 00040 - Process

Emission Source/Control: 10027 - Process

Emission Source/Control: 1002A - Process

Emission Source/Control: 1002D - Process

Emission Source/Control: 10030 - Process

**Item 29.26:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00035

Process: E13

Source Classification Code: 1-02-006-03

Process Description:

This process consists of the natural gas fired burner for the Model 25 oxidizer (Oxidizer #2) with a maximum rated capacity of 2.7 MMBtu/hr.

Emission Source/Control: E0013 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00025 - Process

Emission Source/Control: 00036 - Process

Emission Source/Control: 00040 - Process

Emission Source/Control: 10027 - Process

Emission Source/Control: 1002A - Process

Emission Source/Control: 1002D - Process

Emission Source/Control: 10030 - Process

**Item 29.27:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00036

Process: E06

Source Classification Code: 1-02-006-03

Process Description:

This process consists of Aging Oven 1. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 MMBtu/hr.

Emission Source/Control: E0006 - Process

Design Capacity: 2 million Btu per hour

**Item 29.28:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00036

Process: E07

Source Classification Code: 1-02-006-03

Process Description:

This process consists of Aging Oven 2. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 MMBtu/hr.

Emission Source/Control: E0007 - Process

Design Capacity: 2 million Btu per hour

**Item 29.29:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00036

Process: E08

Source Classification Code: 1-02-006-03

Process Description:

This process consists of Aging Oven 3. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 MMBtu/hr.

Emission Source/Control: E0008 - Process

Design Capacity: 2 million Btu per hour

**Item 29.30:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00036

Process: E09

Source Classification Code: 1-02-006-03

Process Description:

This process consists of Aging Oven 4. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 MMBtu/hr.

Emission Source/Control: E0009 - Process

Design Capacity: 2 million Btu per hour

**Item 29.31:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00036

Process: E12

Source Classification Code: 1-02-006-02

Process Description:

This process consists of the Remelt Technologies Homogenizing Furnace. Following casting, the aluminum logs are placed into the homogenizing furnace to reduce chemical separation of cast structures and improve workability. The furnace is heated by a natural gas fired burner with a maximum rated capacity of 18 MMBtu/hr. There are two exhaust stacks associated with this furnace since the furnace can travel to either of two locations.

Emission Source/Control: E0012 - Process

Design Capacity: 18 million Btu per hour

**Item 29.32:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-10001

Process: 025

Source Classification Code: 3-99-999-94

Process Description:

This process consists of a 15,000 gallon solution tank used in the aluminum anodize process. Racked parts are immersed in the tank in order to prepare the parts for subsequent processing. The tank is heated with a natural gas fired burner. Combustion emissions are exhausted separately. The reactions that occur in the tank in conjunction with the heating of the solution result in the emission of liquid particulate.

Emission Source/Control: 00045 - Process

**Item 29.33:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-10007

Process: 026

Source Classification Code: 3-99-999-94

## Process Description:

Tanks 5 and 7 are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the tanks in order to etch the aluminum parts in an alkaline solution prior to subsequent processing. The tanks are heated with natural gas fired burners. Combustion emissions are exhausted separately. The reactions that occur in the tanks in conjunction with the heating of the solutions result in the emission of liquid particulate. The emissions are controlled with a roof mounted Viron FRP Horizontal scrubber.

Emission Source/Control: 0047A - Control

Control Type: WET SCRUBBER

Emission Source/Control: 00046 - Process

Emission Source/Control: 00050 - Process

**Item 29.34:**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-10008

Process: 027

Source Classification Code: 3-99-999-94

## Process Description:

Tanks 12A and 12B are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the sulfuric anodizing baths in order to impart a hard coat to the parts prior to subsequent processing. The reactions that occur in the tanks result in the emission of liquid particulate. The emissions are controlled with a Viron PVC Mist Eliminator.

Emission Source/Control: 0049A - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 00048 - Process

Emission Source/Control: 00051 - Process

**Condition 30: Compliance Certification****Effective between the dates of 11/09/2021 and 11/08/2026****Applicable Federal Requirement: 40CFR 63.3967(f), Subpart M****Item 30.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00005

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

For each capture device that is not part of a PTE that meets the criteria of §63.3965(a), establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified in paragraphs (1) and (2) below. The operating limit for a PTE is specified in Table 1 of Subpart Mmmm. If the source is a magnet wire coating machine, you may use the procedures in section 2.0 of appendix A of Subpart Mmmm as an alternative.

(1) During the capture efficiency determination required by §63.3960 and described in §§63.3964 and 63.3965, monitor and record either the gas volumetric flow rate or the duct static pressure for each separate capture device in the emission capture system at least once every 15 minutes during each of the three test runs at a point in the duct between the capture device and the add-on control device inlet.

(2) Calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each capture device. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific capture device.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)****Item 31.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

The facility owner or operator shall ensure that all paint booths are equipped with filters at all times coatings are being applied. The filters must be changed on a regular basis and be maintained to ensure compliance with the standard for particulate matter specified in this section.

The facility owner or operator shall maintain records

indicating the date of each filter replacement, any malfunctions that occur, and any corrective action taken. Such records shall be maintained on site for a period of at least five years and must be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 32: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:6 NYCRR 228-1.3 (a)**

**Item 32.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those

days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 33: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)**

**Item 33.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a



format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 34: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)**

**Item 34.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due every 6 calendar month(s).

**Condition 35: Surface Coating- application requirements**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (e)**

**Item 35.1:**

This Condition applies to Emission Unit: U-00035

**Item 35.2:**

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

**Condition 36: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.4 (b) (4)**

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a coating line may not operate the coating line during periods where the installed control device is not in operation unless the facility uses miscellaneous metal parts coatings with an as applied VOC content that does not exceed the limits specified in Table B4 of 6 NYCRR Part 228-1.4(b)(4) or the terms of a facility specific RACT variance granted by the Department. All record keeping, reporting, sampling, and analysis must be conducted as described in 6 NYCRR Parts 228-1.3 and 228-1.6.

The as applied VOC content of each coating shall be calculated using the following formula:

$$(\text{VOC})_a = [(\text{Wv})_a - (\text{Ww})_a - (\text{We})_a] / [1 - [(\text{Vw})_a + (\text{Ve})_a]]$$

Where:

(VOC)<sub>a</sub> is the VOC content of a coating, as applied, expressed as weight of VOC per volume of coating minus water and excluded compounds.

(Wv)<sub>a</sub> is the weight of total volatiles per volume of an as applied coating.

(Ww)<sub>a</sub> is the weight of water per volume of an as applied coating.

(We)<sub>a</sub> is the weight of excluded compounds per volume of an as applied coating.

(Vw)<sub>a</sub> is the volume of water per volume of an as applied coating.

(Ve)<sub>a</sub> is the volume of excluded compounds per volume of an as applied coating.

The facility owner or operator shall maintain records of the dates and times the oxidizer is not in operation, the coatings used during that time, the amount of each coating used for each application, the VOC as applied for each coating used, and all other information necessary to demonstrate compliance with the requirements of Subpart 228-1.4 on site for a period of at least five years. All records kept pursuant to this condition must be provided to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 37: Natural gas fired VOC incineration control device efficiency and seasonal shut down.**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (b)**

**Item 37.1:**

This Condition applies to Emission Unit: U-00035

Item 37.2:

Any VOC incinerator used as control equipment must be designed and operated to provide, at a minimum, a 90 percent overall removal efficiency. The Department may allow an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device for coating lines subject to 6 NYCRR Subpart 228-1 to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation provided that the Department has determined that this action will not jeopardize air quality.

**Condition 38: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (a)**

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 39: Overall Removal Efficiency**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (d)**

**Item 39.1:**

This Condition applies to Emission Unit: U-00035

**Item 39.2:**

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). When the sampling and analysis methods by this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

**Condition 40: VOC content of gas stream test methods**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (e)**

**Item 40.1:**

This Condition applies to Emission Unit: U-00035

**Item 40.2:**

The owner and/or operator of a surface coating line must follow the applicable notification requirements, protocol requirements, and test procedures of 6 NYCRR Part 202 for testing and monitoring. Depending on the conditions at the test site, one of the following methods from Appendix A of 40 CFR Part 60 (see Table 1 of 6 NYCRR Part 200.9) must be used when measuring the VOC content of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas

Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

When the sampling and analysis methods required by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department.

**Condition 41: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (h)**

**Item 41.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 41.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 42: Determining Alternative Facility Specific Emission Limits**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3890(c)(2), Subpart M**

**Item 42.1:**  
This Condition applies to Emission Unit: U-00035

**Item 42.2:**  
The owner and/or operator of an applicable facility which elects to comply with the emission limitations listed in 40 CFR 63, Subpart M using the facility-specific emission limit alternative shall determine compliance as follows:

In calculating a facility-specific emission limit, all coating activities that meet the applicability criteria of the other subcategories and constitute more than 1 percent of total coating activities shall be included. Coating activities that meet the applicability criteria of other surface coating

NESHAP's but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation. The facility-specific emission limit must be calculated when submitting the notification of compliance status required in § 63.3910(c), and on a monthly basis afterward using the coating data for the relevant 12-month compliance period. The facility-specific emission limit for the surface coating operations shall be calculated using equation 1 (see below) for each 12-month compliance period:

$$\text{Facility-Specific Emission Limit} = \left[ \sum_{i=1}^n (\text{Limit}_i) (\text{Solids}_i) \right] / \left[ \sum_{i=1}^n (\text{Solids}_i) \right] \quad (\text{Eq. 1})$$

Where:

Facility-specific emission limit = Facility-specific emission limit for each 12-month compliance period, kg (lb) organic HAP per kg (lb) coating solids used.

Limit(i) = The new source or existing source emission limit applicable to coating operation, i, included in the facility-specific emission limit, converted to kg (lb) organic HAP per kg (lb) coating solids used, if the emission limit is not already in those units. All emission limits included in the facility-specific emission limit must be in the same units.

Solids(i) = The liters (gal) of solids used in coating operation, i, in the 12-month compliance period that is subject to emission limit, i. The volume of coating solids used may be estimated from parameters other than coating consumption and volume solids content (*e.g.*, design specifications for the parts or products coated and the number of items produced). The use of parameters other than coating consumption and volume solids content must be approved by the permitting agency.

n = the number of different coating operations included in the facility specific emission limit.

If an emission limit in another surface coating NESHAP needs to be converted from kg (lb) organic HAP per kg (lb) coating solids used to kg (lb) organic HAP per liter (gal) coating solids used, the default solids density of 1.26 kg solids per liter coating solids (10.5 lb solids per gal solids) must be used.

**Condition 43: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3891(c), Subpart M**

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning



materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis.

If the facility chooses this compliance option, the facility must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in §63.3892, and that the facility meets the work practice standards listed in §63.3893. The facility must also meet the requirements of §63.3960-3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 44: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3892(b), Subpart M**

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

For any controlled coating operations on which the facility chooses to use add-on controls to comply with the emission limit, the facility must meet the operating limits specified in Table 1 of 40 CFR 63 Subpart M. These emission limits apply to the emissions capture and control systems on the coating operations for which the facility uses this option. The facility must establish the operating limits during the performance test according to the requirements of 40 CFR 63.3967.

For facilities using an emission capture system that is a permanent total enclosure (PTE) in accordance with 40 CFR 63.3965(a), the facility must maintain a pressure drop across the enclosure of at least 0.007 inches of water, as established pursuant to Method 204 of Appendix M to 40 CFR Part 51. The facility must meet the operating limit at all times coatings are being applied.

Parameter Monitored: PRESSURE DROP  
 Lower Permit Limit: 0.007 inches of water  
 Reference Test Method: Method 204 - 40 CFR 51 Appendix M  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2022.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 45: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3893(b), Subpart M**

**Item 45.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
 CAS No: 0NY100-00-0 TOTAL HAP

**Item 45.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

If the facility uses the add-on controls option, the facility must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which the facility uses this option; or the facility must meet an alternative standard as provided in §63.3893(c).

The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

1) All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

- 2) Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
- 3) Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
- 4) Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- 5) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 46:     Periods when emission limit must be met**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3900(a)(2)(i), Subpart M MMM**

**Item 46.1:**

This Condition applies to   Emission Unit: U-00035

**Item 46.2:**

Before January 5, 2021, the coating operation(s) must be in compliance with the applicable emission limit in 40 CFR 63.3890 at all times except during periods of SSM. On or after January 5, 2021, the facility must be in compliance with the applicable emission limits in 40 CFR 63.3890 and the operating limits in table 1 of subpart M MMM at all times.

**Condition 47:     Times when the facility must be in compliance with**  
**operating limits**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3900(a)(2)(ii), Subpart M MMM**

**Item 47.1:**

This Condition applies to   Emission Unit: U-00035

**Item 47.2:**

Before January 5, 2021, the coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of SSM and except for solvent recovery systems for which you conduct liquid-liquid material balances according to 40 CFR 63.3961(j). On or after January 5, 2021, the coating operation(s) must be in compliance with the operating limits for emission

capture systems and add-on control devices required by 40 CFR 63.3892 at all times, except for solvent recovery systems for which the owner or operator conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

**Condition 48: Operation of affected source(s) during periods of startup, shutdown, or malfunction**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3900(b), Subpart M**

**Item 48.1:**

This Condition applies to Emission Unit: U-00035

**Item 48.2:**

Before January 5, 2021, the owner or operator must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with subpart M, according to the provisions in 40 CFR 63.6(e)(1)(i). On and after January 5, 2021, at all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the affected source.

**Condition 49: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3920(a), Subpart M**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit semiannual compliance reports for each affected source according to §63.3920(a)(1)-(7).

Unless the EPA Administrator agrees to an alternative

schedule, the facility must submit semiannual reports on the following schedule:

The first semiannual period will begin after the initial compliance period described in §63.3940, 3950, or 3960 ends and the semiannual period ends on June 30th or December 31st, whichever date is the first date following the end of the initial compliance period. The first semiannual report will be due on July 31st or January 31st, whichever date is the first date following the end of the semiannual period. Each subsequent report will be due on July 31st or January 31st and will cover the six months previous (7/31 report will cover 1/1-6/30 and the 1/31 report will cover 7/1-12/31). If the source is subject to title V permitting regulations pursuant to 40 CFR 70 or 71, and if NYS DEC has established dates for submitting semiannual reports for title V, the facility may submit the first and subsequent compliance reports according to the dates DEC has established instead of the dates listed in this paragraph.

Each affected source that has obtained a title V operating permit must report all deviations as defined in Subpart MMMM in the semiannual monitoring report required in Parts 70 and 71. If an affected source submits a semiannual report pursuant to this condition along with, or as part of, the semiannual report for title V, and the semiannual report includes all required information concerning deviations from any emission limitation in Subpart MMMM, the submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a semiannual report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the NYSDEC.

The semiannual compliance report shall contain the information listed in §63.3920(a)(3)(i)-(vii), and the information specified in §63.3920(a)(4)-(7) and (c)(1) that is applicable to the affected source.

If there were no deviations from the emission limits in §63.3890, 3892, or 3893, the semiannual compliance report must include a statement that there were no deviations from the emission limits during the reporting periods. For affected sources opting to comply with the emission limit by using add-on controls and there were no periods during which the continuous parameter monitoring system (CPMS) were out-of-control as specified in §63.8(c)(7), then the semiannual report shall contain a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

If the facility is using the compliant coating option and there was a deviation from any applicable emission

limit(s), then the semiannual report shall contain the information listed in §63.3920(a)(5)(i)-(v)

If the facility is using the emission rate without add-on control option and there was a deviation from any applicable emission limit(s), then the semiannual report shall contain the information listed in §63.3920(a)(6)(i)-(iv)

If the facility is using the emission rate with add-on control option and there was a deviation from any applicable emission limit(s), then the semiannual report shall contain the information listed in §63.3920(a)(7)(i)-(xii), (xiv), and (xv). If there was a deviation from the applicable work practice standards in §63.3893(b), the semiannual compliance report must contain the information in §63.3920(a)(7)(xiii).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 50: Performance Test Reports**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3920(b), Subpart MMMM**

**Item 50.1:**

This Condition applies to Emission Unit: U-00035

**Item 50.2:**

If the facility uses the emission rate with add-on controls option to comply with the emission rates listed in 40 CFR 63.3890, the facility owner or operator must submit reports of performance test results for emission capture systems and add-on control devices no later than 60 days after completing the tests as specified in 40 CFR 63.10(d)(2).

**Condition 51: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3930, Subpart MMMM**

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

## Monitoring Description:

The facility owner or operator must collect and keep records of the data and information specified in this condition. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that the facility submitted to comply with 40 CFR 63 Subpart M, and the documentation supporting each notification and report. If the facility is using the facility-specific emission limit alternative under 40 CFR 63.3890(c), the facility owner or operator must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. The facility owner or operator must also keep records of any data used in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the facility conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the facility owner or operator must keep a copy of the complete test report. If the facility owner or operator uses information provided to the facility by the manufacturer or supplier of the material that was based on testing, the facility owner or operator must keep the summary sheet of results provided to the facility by the manufacturer or supplier. The facility owner or operator is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (1) and (2) below.

(1) A record of the coating operations on which the facility used each compliance option and the time periods (beginning and ending dates and times) for each option used.

(2) Records of the calculations specified in paragraphs (i) through (v) below.

(i) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of 40 CFR 63.3951 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR

63.3951(c)(4);

(ii) The calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951;

(iii) The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of 40 CFR 63.3961 and Equations 2, 3, and 3A through 3C of 40 CFR 63.3961, as applicable;

(iv) The calculation of each month's organic HAP emission rate using Equation 4 of 40 CFR 63.3961; and

(v) The calculation of each 12-month organic HAP emission rate using Equation 5 of 40 CFR 63.3961.

(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) If the facility uses either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(h) Before January 5, 2021, the facility owner or operator must keep records of the date, time, and duration of each deviation. On and after January 5, 2021, for each deviation from an emission limitation reported under 40 CFR 63.3920(a)(5) through (7), a record of the information specified in paragraphs (1) through (4) below, as applicable.

(1) The date, time, and duration of the deviation, as reported under 40 CFR 63.3920(a)(5) through (7).

(2) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under 40 CFR 63.3920(a)(5) through (7).

(3) An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in 40 CFR 63.3890 or any applicable operating limit in Table 1 of 40 CFR 63 Subpart M, and a description of the method



used to calculate the estimate, as reported under 40 CFR 63.3920(a)(5) through (7).

(4) A record of actions taken to minimize emissions in accordance with 40 CFR 63.3900(b) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(i) If the facility uses the emission rate with add-on controls option, the facility owner or operator must also keep the records specified in paragraphs (1) through (7) below.

(1) Before January 5, 2021, for each deviation, a record of whether the deviation occurred during a period of SSM. On and after January 5, 2021, a record of whether the deviation occurred during a period of SSM is not required.

(2) Before January 5, 2021, the records in 40 CFR 63.6(e)(3)(iii) through (v) related to SSM. On and after January 5, 2021, the records in 40 CFR 63.6(e)(3)(iii) through (v) related to SSM are not required.

(3) The records required to show continuous compliance with each operating limit specified in Table 1 of 40 CFR 63 Subpart M that applies to the facility.

(4) For each capture system that is a PTE, the data and documentation the facility used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a PTE and has a capture efficiency of 100 percent, as specified in 40 CFR 63.3965(a).

(5) The records specified in paragraphs (i) and (ii) below for each add-on control device organic HAP destruction or removal efficiency determination as specified in 40 CFR 63.3966.

(i) Records of each add-on control device performance test conducted according to 40 CFR 63.3964 and 63.3966.

(ii) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

(6) Records of the data and calculations the facility used to establish the emission capture and add-on control device operating limits as specified in 40 CFR 63.3967 and to document compliance with the operating limits as specified in Table 1 of 40 CFR 63 Subpart M.

(7) A record of the work practice plan required by 40 CFR 63.3893 and documentation that the facility is implementing the plan on a continuous basis.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due every 6 calendar month(s).

**Condition 52: Length of time to keep records**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3931, Subpart MMMM**

**Item 52.1:**

This Condition applies to Emission Unit: U-00035

**Item 52.2:**

Records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. On and after January 5, 2021, any records required to be maintained by subpart MMMM that are in reports that were submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.

As specified in §63.10(b)(1), the facility must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record

The facility must keep each record on-site for at least 2 years after the date of the occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The records may be kept off-site for the remaining 3 years.

**Condition 53: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3963(a), Subpart MMMM**

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

To demonstrate continuous compliance with the applicable emission limit in §63.3890, the organic HAP emission rate for each compliance period, determined according to the procedures in §63.3961, must be equal to or less than the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3960 is the end of a compliance period consisting of that month and the preceding 11 months.

The facility must perform the calculations in §63.3961 on a monthly basis using data from the previous 12 months of operation. If the facility is complying with a facility-specific emission limit under §63.3890(c), the facility must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3963(b), Subpart M**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limit for that compliance period that must be reported as specified in §63.3910(c)(6) and 63.3920(a)(7).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 55: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3963(c), Subpart MMMM**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must demonstrate continuous compliance with each operating limit required in §63.3892 that applies, as specified in Table 1 to Subpart MMMM, when the coating line is in operation.

If an operating parameter is out of the allowed range specified in Table 1 to Subpart MMMM, this is a deviation from the operating limit that must be reported as specified in §63.3910(c)(6) and 63.3920(a)(7).

If an operating parameter deviates from the operating limit specified in Table 1 to Subpart MMMM, then the facility must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the facility has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 56: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3963(d), Subpart MMMM**

**Item 56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must meet the requirements for bypass lines in §63.3968(b) for controlled coating operations for which the facility does not conduct liquid-liquid material balances. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in §63.3910(c)(6) and 63.3920(a)(7). For the purposes of completing the compliance calculations specified in §63.3961(h), the facility must treat the materials used during a deviation on a controlled coating operations if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of §63.3961.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 57: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3963(e), Subpart M**

**Item 57.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 57.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must demonstrate continuous compliance with the work practice standards in §63.3893. If the facility did not develop a work practice plan, or the facility did not implement the plan, or the facility did not keep the records required by §63.3930(k)(8), this is a deviation from the work practice standards that must be reported as

specified in §63.3910(c)(6) and §63.3920(a)(7).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 58: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3963(f), Subpart MMMM**

**Item 58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As part of each semiannual compliance report required in §63.3920, the facility must identify the coating operation(s) for which the emission rate with add-on control option was used. If there were no deviations from the emission limits in §63.3890, the operating limits in §63.3892, and the work practice standards in §63.3893, submit a statement that the facility was in compliance with the emission limits during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, and that the facility achieved the operating limits required by §63.3892 and the work practice standards required by §63.3893 during each compliance period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 59: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3964(b), Subpart MMMM**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

**Item 59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To ensure continued compliance with the requirements of 40 CFR 63 Subpart M, the facility owner or operator shall conduct a performance test once every five years. The performance test shall determine the efficiency of the emission capture system (Permanent Total Enclosure) and the add-on control devices (Regenerative Thermal Oxidizers).

The facility owner or operator must conduct each performance test to determine the efficiency of the permanent total enclosure in accordance with the provisions of 40 CFR 63.3965.

The facility owner or operator must conduct each performance test to determine the efficiency of each regenerative thermal oxidizer in accordance with the provisions of 40 CFR 63.3966.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 60: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3967(a), Subpart M**

**Item 60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

During the performance test required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the

facility must establish the operating limits required by 40 CFR 63.3892 as specified in items (1) and (2) below, unless the facility received approval for alternative monitoring and operating limits pursuant to 40 CFR 63.8(f) as specified in 40 CFR 63.3892.

(1) During the performance test, the facility must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The facility must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(2) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 61: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3968(a), Subpart M**

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in §63.3968(c), (e), (f), and (g) according to the following provisions:

- The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The facility must have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.



- The facility must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.
- The facility must record the results of each inspection, calibration, and validation check of the CPMS
- Before January 5, 2021, the facility must maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment. On and after January 5, 2021, the facility must maintain the CPMS at all times in accordance with 40 CFR 63.3900(b) and keep necessary parts readily available for routine repairs of the monitoring equipment.
- Before January 5, 2021, the facility must operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments). On and after January 5, 2021, the facility must operate the CPMS and collect emission capture system and add-on control device parameter data at all times in accordance with 40 CFR 63.3900(b).
- The facility must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The facility must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
- A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Before January 5, 2021, any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements. On and after January 5, 2021, except for periods of required quality assurance or control activities, any period for which the CPMS fails to operate and record data continuously as required by 40 CFR 63.3968(a)(5), or generates data that cannot be included in calculating averages as specified in 40 CFR 63.3968(a)(6) constitutes a deviation from the monitoring requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 62: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3968(b), Subpart M**

**Item 62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must meet the following requirements for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

The facility must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The facility uses the following methods to monitor or secure the valve or closure mechanism:

Valve Closure Monitoring ensures that any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every 15 minutes. The monitoring system must be visually inspected at least once every month to verify that the monitor will indicate valve position.

The Automatic Shutdown System stops the coating operation when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the coating operating is running. The automatic shutdown system must be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation.

The facility shall maintain a log and/or records of the monthly inspections required by this condition on site for a period of at least five years from the date of the record. Each such log or record shall include the date and time of the inspection, the results of the inspection, any

deviations found, any corrective actions taken, and any other pertinent information.

If any bypass line is opened, the facility must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in 40 CFR 63.3920.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 63: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3968(c), Subpart MMMM**

**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For all gas temperature monitoring devices installed in a thermal or catalytic oxidizer, the facility shall conduct an accuracy audit every quarter and after every deviation.

Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 64: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3968(c), Subpart MMMM**

**Item 64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is using a thermal oxidizer as an add-on control device, then the facility shall comply with the provisions listed in §63.3968(a) and 3968(c)(3)(i)-(v) which includes the following:

- 1) Install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs
- 2) For each gas temperature monitoring device:
  - locate the temperature sensor in a position that provides a representative temperature
  - use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0% of the temperature value, whichever is larger
  - before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 65: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement: 40CFR 63.3968(c), Subpart M**

**Item 65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each gas temperature monitoring device installed in a thermal or catalytic oxidizer, the facility shall conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used. For the purposes of this requirement, a thermocouple is part of the temperature sensor.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 66: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3968(g), Subpart MMMM**

**Item 66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each flow measurement device in a capture system monitoring system, the facility must conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 67: Compliance Certification**

**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3968(g), Subpart MMMM**

**Item 67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each flow measurement device in a capture system monitoring system, the facility shall perform leak checks on a monthly basis.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 68: Compliance Certification**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable Federal Requirement:40CFR 63.3968(g), Subpart MMMM**

**Item 68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each flow measurement device in a capture system monitoring system, the facility must meet the requirements listed in §63.3968(a) and (g)(1)(i)-(vii) which includes:

- 1) Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device.
- 2) Use a flow sensor with an accuracy of at least 10% of the flow

3) Perform an initial sensor calibration in accordance with the manufacturer's requirements

4) Perform a validation check before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 69: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3968(g), Subpart MMMM**

**Item 69.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 69.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each flow measurement device in a capture system monitoring system, the facility shall perform visual inspections of the sensor system quarterly if there is no redundant sensor.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 70: Compliance Certification**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable Federal Requirement:40CFR 63.3892(b), Subpart MMMM**

**Item 70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035

Process: E01

Emission Source: E001A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator of a coating line subject to the requirements of 40 CFR 63 Subpart M that chooses to meet the organic hazardous air pollutant emission limits using add-on controls must establish and maintain the operating limits specified in Table 1 of Subpart M for each add-on control device.

The owner or operator of a facility using a thermal oxidizer as the add-on control device must not allow the average combustion temperature to fall below the minimum temperature specified below during each 3-hour period. Temperature data shall be recorded at one minute intervals using a continuous monitoring system. For paint runs lasting less than 3 hours, the average combustion temperature shall be based on one minute readings averaged over the length of the paint run. Paint runs exceeding 3 hours must be divided into blocks of 3 hours and a block of less than 3 hours.

The facility owner or operator must not use combustion temperature data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1474 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 71: Compliance Certification****Effective between the dates of 11/09/2021 and 11/08/2026****Applicable Federal Requirement: 40CFR 63.3892(b), Subpart M****Item 71.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00035



Process: E13

Emission Source: E0013

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 71.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator of a coating line subject to the requirements of 40 CFR 63 Subpart M that chooses to meet the organic hazardous air pollutant emission limits using add-on controls must establish and maintain the operating limits specified in Table 1 of Subpart M for each add-on control device.

The owner or operator of a facility using a thermal oxidizer as the add-on control device must not allow the average combustion temperature to fall below the minimum temperature specified below during each 3-hour period. Temperature data shall be recorded at one minute intervals using a continuous monitoring system. For paint runs lasting less than 3 hours, the average combustion temperature shall be based on one minute readings averaged over the length of the paint run. Paint runs exceeding 3 hours must be divided into blocks of 3 hours and a block of less than 3 hours.

The facility owner or operator must not use combustion temperature data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1457 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**STATE ONLY ENFORCEABLE CONDITIONS****\*\*\*\* Facility Level \*\*\*\*****NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) the equipment at the facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

**Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to

properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

#### STATE ONLY APPLICABLE REQUIREMENTS

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 72: Contaminant List**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable State Requirement:ECL 19-0301**

**Item 72.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000110-00-9  
Name: FURAN C4H4O

CAS No: 001746-01-6  
Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 007440-47-3  
Name: CHROMIUM

CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY100-00-0  
Name: TOTAL HAP

**Condition 73: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 73.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 74: CLCPA Applicability****Effective between the dates of 11/09/2021 and 11/08/2026****Applicable State Requirement: 6 NYCRR 201-6.5 (a)****Item 74.1:**

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 75: Compliance Demonstration****Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)****Item 75.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: U-00016

Process: 012

Emission Source: 00016

Emission Unit: U-00017

Process: 013

Emission Source: 00017

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

**Item 75.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

The acid and alkaline showers contained within emission units U-00016 and U-00017 emit 0.000531 pounds per hour of total chromium of which 0.000416 pounds per hour is hexavalent chromium as measured during a stack test conducted on 7/29/2015. These contaminants are listed as HTACs in Table 2 of 6 NYCRR Section 212-2.2, and the emissions have been assigned an A rating by the Department. Accordingly, the facility owner or operator must demonstrate that the emissions from these emission units meet, and will continue to meet, the annual guideline concentrations specified in the Department's DAR-1 guidance document, as required by Table 4 of 6 NYCRR Subdivision 212-2.3(b).

Keymark Corporation has provided an air dispersion modeling analysis that indicates that the maximum offsite concentration for hexavalent chromium exceeds the annual guideline concentration described in DAR-1. Accordingly, the Department has performed a T-BACT analysis as described in 6 NYCRR 212-1.2(20) and concluded that the maximum degree of emissions control is being applied to this process.

This determination is contingent on the usage of AC-8701 with a concentration of approximately 10.3% chromic acid in the facility's acid pretreatment shower remaining at or below 140,000 pounds per year. The facility owner or operator shall maintain records indicating the amount of AC-8701 used at the facility on a 12-month rolling basis, and shall submit a notification to the Department if the usage exceeds the limit described above during any 12-month period.

If the facility's total usage of AC-8701 exceeds the specified limit for two consecutive months, the facility owner or operator shall prepare and submit a revised air dispersion modeling analysis taking the increased usage of AC-8701 into account. The revised analysis shall be submitted within 30 days of the date the increase was reported to the Department.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: ACID

Upper Permit Limit: 140000 pounds

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 76: Compliance Demonstration**  
**Effective between the dates of 11/09/2021 and 11/08/2026**

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)**

**Item 76.1:**

The Compliance Demonstration activity will be performed for the facility:  
 The Compliance Demonstration applies to:

Emission Unit: U-00005

Emission Unit: U-00006

Regulated Contaminant(s):

CAS No: 000110-00-9	FURAN C4H4O
CAS No: 001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN
CAS No: 0NY075-00-0	PARTICULATES
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 76.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Stack testing was performed on the exhaust hoods from cast house melter and holder during the period of December 3-17 2002 in order to measure emissions of hydrochloric acid, dioxin/furan, and particulate matter. Testing was performed under maximum melter and holder loading conditions, and demonstrated compliance with the requirements of Table 4 of 6 NYCRR Part 212-2.3(b).

The facility owner or operator shall prevent overflowing of the melter and holder by operating within the conditions used during testing (at or below maximum load). In the event that an overflow of the melter or holder

occurs, the facility owner or operator shall create and maintain a record indicating the date and cause of the overflow, and a description of any corrective action taken. Such records shall be maintained at the facility for a period of at least five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

**Condition 77: Compliance Demonstration**  
Effective between the dates of 11/09/2021 and 11/08/2026

**Applicable State Requirement: 6 NYCRR 212-2.3 (b)**

**Item 77.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-10007

Process: 026

Emission Source: 0047A

Emission Unit: U-10008

Process: 027

Emission Source: 0049A

**Item 77.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 4 of 6 NYCRR Subpart 212-2.3(b) for the environmental rating issued by the Department. The environmental rating assigned to all contaminants emitted from these emission units is B.

Compliance with this requirement will be demonstrated by operating and maintaining the control equipment (wet scrubber) in accordance with the manufacturer's specified operating procedures, instructions, and requirements. A copy of the manufacturer's operating procedures, instructions, and requirements shall be maintained with the permit for this facility at all times.

The facility owner or operator must perform monthly inspections of the control device. If the control equipment is not operating as described in the manufacturer's instructions, corrective action must be taken.

The facility owner or operator must maintain a log and/or

records indicating the date and results of each monthly inspection, any routine maintenance activities performed on the control device, and any repairs or other corrective action taken. The log and/or records must be maintained at the facility for a period of at least five years.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).



